

Hearing Date/Time: October 23, 2019 at 10:00 a.m.

Objection Deadline: October 11, 2019 at 12:00 noon

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Administrator of the Estate of James Garbe

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

| | | |
|-------------------------------------|---|-------------------------|
| ----- | X | |
| In re | : | |
| | : | Chapter 11 |
| SEARS HOLDINGS CORPORATION, et al., | : | |
| | : | Case No. 18-23538 (RDD) |
| Debtors ¹ . | : | |
| | : | (Jointly Administered) |
| ----- | X | |

**NOTICE OF HEARING ON MOTION OF RELATOR CARL IRELAND,
ADMINISTRATOR OF THE ESTATE OF JAMES GARBE, FOR AN ORDER (I)
DETERMINING THE VALUE OF RELATOR'S COLLATERAL AS OF THE SALE
OF SUCH COLLATERAL; (II) DETERMINING THE AMOUNT OF ANY
DIMINUTION IN THE AMOUNT OF THE SALES PROCEEDS ALLOCABLE TO
SUCH COLLATERAL AFTER THE SALE; (III) DIRECTING PAYMENT OF
RELATOR'S SECURED AND SUPERPRIORITY ADMINISTRATIVE CLAIMS;
AND (IV) GRANTING RELATED RELIEF**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); Max Serv, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (19870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

PLEASE TAKE NOTICE that a hearing shall be held on **October 23, 2019 at 10:00 a.m.** (the Hearing) before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Courthouse, 300 Quarropas Street, White Plains, New York 10601, to consider the *Motion of Relator Carl Ireland, Administrator of the Estate Of James Garbe, for an Order (I) Determining the Value of Relator's Collateral as of the Sale of Such Collateral; (II) Determining the Amount of Any Diminution in the Amount of the Sales Proceeds Allocable to Such Collateral After the Sale; (III) Directing Payment of Relator's Secured and Superpriority Administrative Claims; and (IV) Granting Related Relief* (the Motion)[Docket No 4931].

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief sought in the Motion shall be in writing, state with particularity the basis for the objection, and be filed with the Bankruptcy Court in accordance with the Local Rules of the Bankruptcy Court of the Southern District of New York (the Local Rules) by users of the Bankruptcy Court's case filing system, and by all other parties, on a 3.5 inch disk, with a hard copy to Chambers, and served in accordance with the Local Rules and upon Halperin Battaglia Benzija, LLP, 40 Wall Street, 37th Floor, New York, New York 10005, Attn: Alan D. Halperin. Esq. and Donna H. Lieberman Esq. so as to be received no later than **12:00 noon on October 11, 2019**. Any such objection shall state with specificity the reason or reasons why the relief sought in the Motion should not be granted.

PLEASE TAKE FURTHER NOTICE that if no objections are timely filed and served, the Court may grant the relief requested in the Motion without further notice or hearing.

Dated: New York, New York
August 21, 2019

HALPERIN BATTAGLIA BENZIJA, LLP

By: /s/ Alan D. Halperin
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